

BARACK FERRAZZANO KIRSCHBAUM  
PERLMAN & NAGELBERG LLP  
333 West Wacker Drive, Suite 2700  
Chicago, IL 60606  
Tel. No. 312-984-3100  
Fax No. 312-984-3150  
William J. Barrett (IL 6206424)  
Kimberly J. Robinson (IL 6194420)

Hearing Date: Nov. 30, 2006 at 10:00 a.m.  
Objection Deadline: Nov. 24, 2006 at 4:00 p.m.

Counsel for Motion Industries, Inc.

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

In re

DELPHI CORPORATION, *et al.*,

Debtors.

Chapter 11

Case No. 05-44481 (RDD)

Jointly Administered

**JOINDER OF MOTION INDUSTRIES, INC.  
TO KILROY REALTY, LP'S OBJECTION TO THE  
DEBTORS' PROPOSED PROCEDURES GOVERNING HEARING REGARDING  
DISALLOWANCE OR ESTIMATION OF CLAIMS**

Motion Industries, Inc. ("Motion"), by and through its undersigned attorneys, hereby joins in (this "Joinder") the objection of Kilroy Realty, LP (the "Objection") to the relief sought by the above-captioned debtors (the "Debtors") in their motion for order establishing (I) dates for hearings regarding disallowance or estimation of claims and (II) certain notices and procedures governing hearing regarding disallowance or estimation of claims (the "Claims Objection and Estimation Procedures Motion"). In support of this Joinder, Motion respectfully represents as follows:

1. On October 8, 2005, the Debtors filed voluntary petitions for relief under chapter 11 of title 11 of the United State Code, 11 U.S.C. §§101 *et seq.* (the "Bankruptcy Code").

2. On July 21, 2006, Motion filed the following claims in the following of the Debtors' cases: Claim No. 10251 in the amount of \$835,355.82 in the Delphi Automotive

Systems, LLC case; Claim No. 10235 in the amount of \$834,798.60 in the Delphi Corporation case; Claim No. 10232 in the amount of \$108,287.35 in the Delphi Medical Systems, Colorado Corporation case; and Claim No. 10231 in the amount of \$6,132.75 in the Delphi Connections Systems case. On November 9, 2006, Motion filed Claim No. 16416 in the amount of \$877,554.25 in the Delphi Automotive Systems, LLC case, which claim amended Claim No. 10251 referenced above.

3. Through the Claims Objection and Estimation Procedures Motion, the Debtors seek to establish certain procedures governing hearings regarding disallowance or estimation of claims. For the reasons set forth in the Objection, Motion also objects to the relief requested in the Claims Objection and Estimation Procedures Motion as unfair, contrary to the rules governing the resolution of claims objections, and as providing too much discretion to the Debtors in the claims resolution process.

WHEREFORE, Motion respectfully requests that this Court (a) deny the relief requested in the Claims Objection and Estimation Procedures Motion and (b) grant such other and further relief as this Court deems just and proper.

Dated: November 22, 2006 at Chicago, Illinois.

MOTION INDUSTRIES, INC.

By /s/ William J. Barrett  
William J. Barrett (IL 6206424)  
Kimberly J. Robinson (IL 6194420)  
BARACK FERRAZZANO KIRSCHBAUM  
PERLMAN & NAGELBERG LLP  
333 West Wacker Drive, Suite 2700  
Chicago, IL 60606  
Tel. No. 312-984-3100  
[William.barrett@bfkpn.com](mailto:William.barrett@bfkpn.com)  
[Kimberly.robinson@bfkpn.com](mailto:Kimberly.robinson@bfkpn.com)

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing **Joinder of Motion Industries, Inc. to Kilroy Realty, LP's Objection to the Debtors' Proposed Procedures Governing Hearing Regarding Disallowance or Estimation of Claims** was filed electronically this 22<sup>nd</sup> day of November, 2006 and the foregoing was sent via e-mail or overnight delivery to the following parties:

Delphi Corporation  
5725 Delphi Drive  
Troy, Michigan 48098  
Attn: General Counsel  
(served via overnight courier)

Skadden, Arps, Slate, Meagher & Flom  
333 West Wacker Drive  
Suite 2100  
Chicago, Illinois 60606  
Attn: John Wm. Butler, Esq.  
Email: [jbutler@skadden.com](mailto:jbutler@skadden.com)

Simpson Thacher & Bartlett LLP  
425 Lexington Avenue  
New York, New York 10017  
Attn: Kenneth S. Ziman, Esq.  
Email: [kziman@stblaw.com](mailto:kziman@stblaw.com)

Davis Polk & Wardwell  
450 Lexington Avenue  
New York, New York 10017  
Attn: Marlane Melican, Esq.  
Email: [marlane.melican@dpw.com](mailto:marlane.melican@dpw.com)

Latham & Watkins  
885 Third Avenue  
New York, New York 10022-4802  
Attn: Mark A. Broude, Esq.  
Attn: Robert J. Rosenberg, Esq.  
Email: [mark.broude@lw.com](mailto:mark.broude@lw.com)  
[robert.rosenberg@lw.com](mailto:robert.rosenberg@lw.com)

Fried, Frank, Harris, Shriver & Jacobson LLP  
One New York Plaza  
New York, New York 10004  
Attn: Bonnie Steingart, Esq.  
Email: [steinbo@friedfrank.com](mailto:steinbo@friedfrank.com)

Office of the United States Trustee  
Southern District of New York  
33 Whitehall Street, Suite 2100  
New York, New York 10004  
Attn: Alicia M. Leonhard, Esq.  
(served via overnight courier)

/s/ William J. Barrett  
William J. Barrett